

EXHIBIT C

CaseyGerry

CASEY GERRY SCHENK FRANCAVILLA BLATT & PENFIELD LLP

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March 28, 2022

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President,
California State Bar, 1976

Richard F. Gerry
1924-2004
President,
Association of Trial Lawyers
of America, 1982

David S. Casey, Jr.
President,
Association of Trial Lawyers
of America, 2004

*Also admitted in New Mexico
**Also admitted in New York

Via Registered Mail

American Family Mutual Insurance Company, S.I.

Attn: Chief Information Security Officer

6000 American Parkway

Madison, WI 53783

Re: Robert Park v. American Family Life Insurance and American
Family Mutual Insurance Company, S.I.

Please take notice that this letter constitutes notice under the California Consumer Privacy Act ("CCPA"), California Civil Code section 1798.100, et seq. Pursuant to Civil Code section 1798.150(b), we are hereby notifying American Family Mutual Insurance Company, S.I. ("American Family") of violating the CCPA and of my demand that, to the extent any cure exists, you cure such violation within thirty (30) calendar days from your receipt of this letter.

Plaintiff Robert Park, a resident of California, received notice from American Family dated January 14, 2022, informing him of a "data security incident involving an online life insurance quoting platform of American Family Life Insurance Company." The notice stated that unauthorized parties may have accessed his driver's license number as part of the quoting platform's pre-fill function.

Please be advised that American Family's failure to prevent Plaintiff and other California consumers' nonencrypted and nonredacted PII from unauthorized access and disclosure as a result of American Family's violation of its duty to implement and maintain reasonable security procedures and practices amounts to a violation of the CCPA, Civil Code section 1798.150. The failure includes the lack of adequate security to maintain its system sufficiently to protect information it

American Family Mutual Insurance Company, S.I.

March 28, 2022

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obtains and hosts from being accessed from unauthorized third parties.

We hereby request that American Family immediately cure the violation of the CCPA which exposed Plaintiff and other California consumers' nonencrypted and nonredacted PII, to the extent there is any possible cure. Please be advised that your failure to comply with this request within thirty (30) calendar days may subject you to statutory damages on an individual and/or class-wide basis.

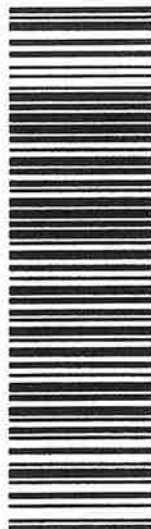
We look forward to discussing this matter with you. Thank you for your courtesy and cooperation.

Sincerely yours,

/s/ Gayle M. Blatt
GAYLE M. BLATT

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American Family Mutual Insurance Company, S.I.
Attn: Chief Information Security Officer
6000 American Parkway
Madison, WI 53783



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Via Registered Mail

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Attn: Chief Information Security Officer
6000 American Parkway
Madison, WI 53783

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Please take notice that this letter constitutes notice under the California Consumer Privacy Act ("CCPA"), California Civil Code section 1798.100, et seq. Pursuant to Civil Code section 1798.150(b), we are hereby notifying American Family Life Insurance ("American Family") of violating the CCPA and of my demand that, to the extent any cure exists, you cure such violation within thirty (30) calendar days from your receipt of this letter.

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American Family Life Insurance
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/s/ Gayle M. Blatt
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